

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Hearing Date: June 25, 2025 at 9:30 A.M. ET

Objection Deadline: June 11, 2025 at 4:00 P.M. ET

Ref. Nos. 30313 & 30337

**CERTIFICATION OF COUNSEL REGARDING FTX RECOVERY TRUST'S ONE  
HUNDRED SEVENTY-THIRD (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO  
CERTAIN LATE FILED PROOFS OF CLAIMS (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust,<sup>2</sup> hereby certify as follows to the best of my knowledge, information and belief:

1. On April 28, 2025, the FTX Recovery Trust filed the *FTX Recovery Trust's One Hundred Seventy-Third (Non-Substantive) Omnibus Objection to Certain Late Filed Proofs of Claims (Customer Claims)* [D.I. 30313, redacted & 30337, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection [D.I. 30313-1 & 30337-1], any responses to the Objection were to be filed no later than June 11, 2025, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The FTX Recovery Trust received informal responses (the “Informal Responses”) to the Objection from the holders of claim numbers 99209, 98903, 99738, 99680, 99186, 99030,

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

99036, 99577, 98833, 99197, 99783, 99853, 99610, 99062, 99839, 99185, 99458, 98806, 99044, 99568, 99344, 99071, and 99514.

4. On May 22, 2025, Tomasz Komenda (“Komenda”) filed a response to the Objection [D.I. 30458] (the “Komenda Response”).

5. On May 22, 2025, Ana Karina Perez (“Perez”) filed a response to the Objection [D.I. 30460] (the “Perez Response”).

6. On May 23, 2025, Xijie Dong (“Dong”) filed a response to the Objection [D.I. 30468] (the “Dong Response”).

7. On May 27, 2025, Lana Aleksandra Rynty (“Rynty”) filed a response to the Objection [D.I. 30479] (the “Rynty Response”).

8. On May 27, 2025, Victor Ridley Meulengracht Geisler (“Geisler”) filed a response to the Objection [D.I. 30471] (the “Geisler Response”).

9. On June 4, 2025, Mariela Elizabeth Silberman Beltramella (“Beltramella”) filed a response to the Objection [D.I. 30597] (the “Beltramella Response”).

10. On June 4, 2025, Joseph Michael Hickey (“Hickey”) filed a response to the Objection [D.I. 30604] (the “Hickey Response”).

11. On June 5, 2025, Christophe Bussi (“Bussi”) filed a response to the Objection [D.I. 30641] (the “Bussi Response”).

12. On June 5, 2025, Jason Spallino (“Spallino”) filed a response to the Objection [D.I. 30640] (the “Spallino Response”).

13. On June 10, 2025, Noah Ryder McArthur (“McArthur”) filed a response to the Objection [D.I. 30685] (the “McArthur Response”).

14. On June 16, 2025, Gert Heinrich Pistor (“Pistor”) filed a response to the Objection

[D.I. 30857] (the “Pistor Response”).

15. On June 16, 2025, Keping You (“You”) filed a response to the Objection [D.I. 30853] (the “You Response”).

16. On June 17, 2025, Leonardo Caramia (“Caramia”) filed a response to the Objection [D.I. 30869] (the “Caramia Response”).

17. As of the Date hereof, no other responses to the Objection have been filed or served on the FTX Recovery Trust.

18. The FTX Recovery Trust has revised the proposed form of order (“Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournment of the Objection solely as to the claims held by Komenda, Perez, Dong, Rynty, Geisler, Beltramella, Hickey, Bussi, Spallino, McArthur, Pistor, You, and Caramia, and claim numbers 98903, 99738, 99680, 99186, 99030, 99036, 99577, 98833, 99197, 99783, 99853, 99610, 99062, 99839, 99185, 99458, 98806, 99044, 99568, 99344, 99071, and 99514. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

19. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: June 26, 2025  
Wilmington, Delaware

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